

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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ALVIN BALDUS, CINDY BARBERA, CARLENE  
BECHEN, RONALD BIENDSEIL, RON BOONE, VERA  
BOONE, ELVIRA BUMPUS, EVANJELINA  
CLEEREMAN, SHEILA COCHRAN, LESLIE W.  
DAVIS III, BRETT ECKSTEIN, MAXINE HOUGH,  
CLARENCE JOHNSON, RICHARD KRESBACH,  
RICHARD LANGE, GLADYS MANZANET,  
ROCHELLE MOORE, AMY RISSEEUW, JUDY  
ROBSON, GLORIA ROGERS, JEANNE SANCHEZ-  
BELL, CECELIA SCHLIEPP, TRAVIS THYSSEN,

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE MOORE  
and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government Accountability  
Board, each only in his official capacity:  
MICHAEL BRENNAN, DAVID DEININGER, GERALD  
NICHOL, THOMAS CANE, THOMAS BARLAND, and  
TIMOTHY VOCKE, and KEVIN KENNEDY, Director  
and General Counsel for the Wisconsin Government  
Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI,  
PAUL D. RYAN, JR., REID J. RIBBLE,  
and SEAN P. DUFFY,

Intervenor-Defendants.

(caption continued on next page)

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**DECLARATION OF JACQUELINE BOYNTON  
IN SUPPORT OF THE BALDUS AND VOCES DE LA FRONTERA PLAINTIFFS'  
PROPOSED REMEDY FOR VOTING RIGHTS ACT VIOLATION**

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Civil Action  
File No. 11-CV-562

Three-judge panel  
28 U.S.C. § 2284

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VOCES DE LA FRONTERA, INC., RAMIRO VARA,  
OLGA WARA, JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

v.

Case No. 11-CV-1011  
JPS-DPW-RMD

Members of the Wisconsin Government Accountability  
Board, each only in his official capacity:  
MICHAEL BRENNAN, DAVID DEININGER, GERALD  
NICHOL, THOMAS CANE, THOMAS BARLAND, and  
TIMOTHY VOCKE, and KEVIN KENNEDY, Director  
and General Counsel for the Wisconsin Government  
Accountability Board,

Defendants.

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I, Jacqueline Boynton, declare, under penalty of perjury and pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am an attorney with the Law Office of Jacqueline Boynton, and I am admitted to practice in the State of Wisconsin and in the U.S. District Court for the Eastern District of Wisconsin. Peter Earle and I represent the Voces de la Frontera plaintiffs in the above-captioned matter. I make this declaration based on my personal knowledge and in support of the Joint Brief of Baldus and Voces de la Frontera Plaintiffs in Support of Proposed Remedy for Voting Rights Act Violation.

2. On April 4 and 5, I communicated with ten (10) members of the Latino community in to discuss whether they had been contacted regarding the Department of Justice's proposed maps for Assembly Districts 8 and 9. Each of these 10 individuals signed a declaration stating that they have not been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van

Deuren S.C. about a proposed map since the Court's Opinion and Order was entered on March 22, 2012.

3. On April 4, 2012, I communicated with Jocasta Zamarripa, the incumbent Representative for Assembly District 8, regarding whether she had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed map. She stated she had not been contacted by anyone regarding such a proposed map. A true and correct copy of Representative Zamarripa's declaration is attached as **Exhibit A**.

4. On April 4, 2012, I communicated with Christine Neumann-Ortiz, the Executive Director of Voces de la Frontera, Inc., regarding whether she had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed map. She stated she had not been contacted by anyone regarding such a proposed map. A true and correct copy of Ms. Neumann-Ortiz's declaration is attached as **Exhibit B**.

5. On April 4, 2012, I communicated with Maria Monreal-Cameron, the President and CEO of the Hispanic Chamber of Commerce of Wisconsin, regarding whether she had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed map. She stated she had not been contacted by anyone regarding such a proposed map. A true and correct copy of Ms. Monreal-Cameron's declaration is attached as **Exhibit C**.

6. On April 5, 2012, I communicated with Juan Carlos Ruiz, the Coordinator for the Milwaukee Latino Redistricting Committee, regarding whether he had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed map. He stated he

had not been contacted by anyone regarding such a proposed map. A true and correct copy of Mr. Ruiz's declaration is attached as **Exhibit D**.

7. On April 4, 2012, I communicated with Steve Fendt, the Executive Director of the Southside Organizing Committee, regarding whether he had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed map. He stated he had not been contacted by anyone regarding such a proposed map. A true and correct copy of Mr. Fendt's declaration is attached as **Exhibit E**.

8. On April 5, 2012, I communicated with Dr. Luis "Tony" Baez, the Executive Director of The Spanish Center regarding whether he had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed map. He stated he had not been contacted by anyone regarding such a proposed map. A true and correct copy of Dr. Baez's declaration is attached as **Exhibit F**.

9. On April 5, 2012, I communicated with Ernesto Chacon, the former Deputy Director for Governor Doyle's Milwaukee office, regarding whether he had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed map. He stated he had not been contacted by anyone regarding such a proposed map. A true and correct copy of Mr. Chacon's declaration is attached as **Exhibit G**.

10. On April 4, 2012, I communicated with Enrique E. Figueroa, Ph.D., Director of the Roberto Hernandez Center at UW-Milwaukee, regarding whether he had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed

map. He stated he had not been contacted by anyone regarding such a proposed map. A true and correct copy of Dr. Figueroa's declaration is attached as **Exhibit H**.

11. On April 4, 2012, I communicated with Jesus Salas, a former Regent for the University of Wisconsin system, regarding whether he had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed map. He stated he had not been contacted by anyone regarding such a proposed map. A true and correct copy of Mr. Salas's declaration is attached as **Exhibit I**.

12. On April 5, 2012, I communicated with John Bartkowski, the Executive Director of the Sixteenth Street Community Health Center, regarding whether he had been contacted by anyone from the Department of Justice, the Attorney General's office, the Government Accountability Board, or the law firm of Reinhart Boerner Van Deuren S.C. about a proposed map. He stated he had not been contacted by anyone regarding such a proposed map. A true and correct copy of Mr. Bartkowski's declaration is attached as **Exhibit J**.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 5, 2012.

s/ Jacqueline Boynton

Jacqueline Boynton

State Bar No. 1014570

2266 N. Prospect Ave. Ste. 505

Milwaukee, WI 53202

414-276-1066

jackie@jboynton.com

7729336\_2

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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ALVIN BALDUS, et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,  
  
Defendants.

VOCES DE LA FRONTERA, INC., et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,  
Defendants.

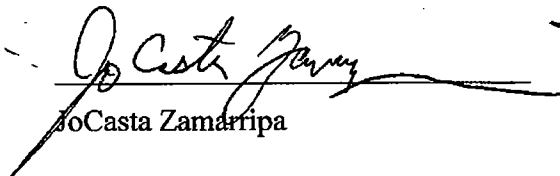
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DECLARATION

JOCASTA ZAMARRIPA, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Representative for the 8<sup>th</sup> Assembly District in Wisconsin.
2. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting case.

Dated: April 4, 2012

  
JoCasta Zamarripa

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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ALVIN BALDUS, et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,  
Defendants.

VOCES DE LA FRONTERA, INC., et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,  
Defendants.


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**DECLARATION**

Christine Neumann-Ortiz, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Executive Director of Voces de la Frontera, Inc. and our office is at 1027 S. 5<sup>th</sup> Street, said office being located in the 8<sup>th</sup> Assembly District.
2. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting case.

Dated: April 4, 2012

  
Christine Neumann-Ortiz

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

---

ALVIN BALDUS, et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,  
Defendants.

VOCES DE LA FRONTERA, INC., et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,  
Defendants.

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**DECLARATION**

Maria Monreal-Cameron, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the President and CEO of the Hispanic Chamber of Commerce of Wisconsin and our office is at 1021 West National Avenue, Milwaukee, Wisconsin, said offices being located in the Joint Plaintiff's proposed 8<sup>th</sup> Assembly District.
2. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting case.

Dated: April \_\_\_\_, 2012



Maria Monreal-Cameron



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

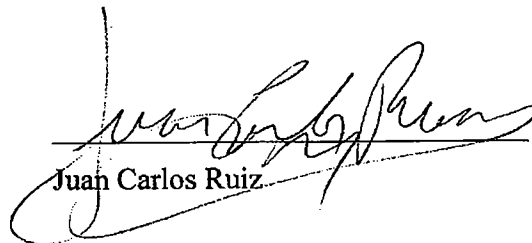
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DECLARATION

Juan Carlos Ruiz, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Coordinator for the Milwaukee Latino Redistricting Committee. Our mission is to work for redistricting that is fair to the Latino and minority communities in Milwaukee and Wisconsin.
2. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting case.

Dated: April 5, 2012

  
Juan Carlos Ruiz

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

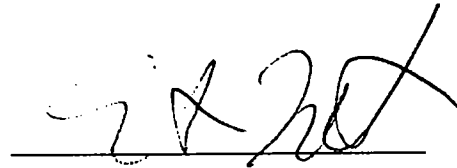
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**DECLARATION**

STEVE FENDT, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Executive Director of the Southside Organizing Committee at 1300 S. Layton Boulevard, Milwaukee.
2. We are a neighborhood-based organization dedicated to the development of Milwaukee's near South Side neighborhoods.
3. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting case.

Dated: April 4, 2012



Steve Fendt

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

---

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

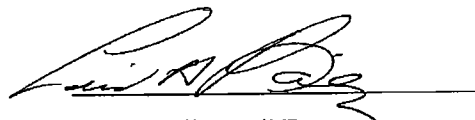
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**DECLARATION**

Dr. Luis "Tony" Baez, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Executive Director of The Spanish Center located at 614 West National Avenue located in the 8<sup>th</sup> Assembly District.
2. We are a Latino community-based organization that offers educational programs and social services to the area encompassed by the proposed Joint Plaintiff's Map for the 8<sup>th</sup> Assembly District.
3. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting litigation.

Dated: April 5, 2012

  
Dr. Luis "Tony" Baez

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

ALVIN BALDUS, et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,  
Defendants.

VOCES DE LA FRONTERA, INC., et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,  
Defendants.

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DECLARATION

Ernesto Chacon, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the former Deputy Director for Governor Jim Doyle's Milwaukee office and a long-time activist in the Latino community and a resident of the near south side.
2. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting case.

Dated: April 5, 2012

  
Ernesto Chacon

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

---

**ALVIN BALDUS, et. al.,  
Plaintiffs,**

**vs.**

**Case No.: 11-C-562**

**MICHAEL BRENNAN, et. al.,  
Defendants.**

**VOCES DE LA FRONTERA, INC., et. al.,  
Plaintiffs,**

**vs.**

**Case No.: 11-C-1011**

**MICHAEL BRENNAN, et. al.,  
Defendants.**

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**DECLARATION**

Enrique E. Figueroa, Ph.D., under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Director of the Roberto Hernandez Center at UW- Milwaukee and our mission is to provide information, resources and opportunities pertinent to the Latino community in southeastern Wisconsin.
2. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting case.

Dated: April 4, 2012

  
Enrique E. Figueroa

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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ALVIN BALDUS, et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,  
Defendants.

VOCES DE LA FRONTERA, INC., et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,  
Defendants.

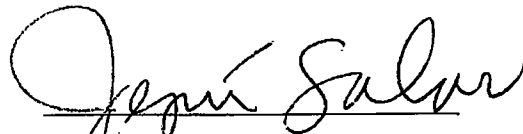
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**DECLARATION**

Jesus Salas, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am a former Regent for the University of Wisconsin system and a civil rights leader in the Latino community and the Wisconsin Farmworkers movement.
2. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting case.

Dated: April 4, 2012

  
Jesus Salas

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

---

ALVIN BALDUS, et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,  
Defendants.

VOCES DE LA FRONTERA, INC., et. al.,  
Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,  
Defendants.


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**DECLARATION**

JOHN BARTKOWSKI, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Executive Director of the Sixteenth Community Health Center.
2. Sixteenth Street Community Health Centers provides high quality health care, health education and social services to low-income residents of Milwaukee's culturally diverse south side.
3. I was never consulted by the Wisconsin Department of Justice, the Attorney General's office, the Government Accountability Board or the law firm of Reinhart Boerner Van Deuren SC about a potential or proposed remedy map since the Court's Opinion and Order was entered on March 22, 2012 in the redistricting case.

Dated: April 5, 2012

  
John Bartkowski

**Brandt, Karen J (15243)**

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**From:** ecfmaster@wied.uscourts.gov  
**Sent:** Thursday, April 05, 2012 6:37 PM  
**To:** ecfmaster@wied.uscourts.gov  
**Subject:** Activity in Case 2:11-cv-00562-JPS-DPW-RMD Baldus et al v. Brennan et al Declaration

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**United States District Court**

**Eastern District of Wisconsin**

**Notice of Electronic Filing**

The following transaction was entered by Earle, Peter on 4/5/2012 at 6:36 PM CDT and filed on 4/5/2012

**Case Name:** Baldus et al v. Brennan et al  
**Case Number:** 2:11-cv-00562-JPS-DPW-RMD  
**Filer:**  
**WARNING: CASE CLOSED on 03/22/2012**  
**Document Number:** 233

**Docket Text:**

**DECLARATION of Jacqueline Boynton *In Support of Plaintiffs' Proposed Remedy for Voting Rights Act Violation.*** (Attachments: # (1) Exhibit A, # (2) Exhibit B, # (3) Exhibit C, # (4) Exhibit D, # (5) Exhibit E, # (6) Exhibit F, # (7) Exhibit G, # (8) Exhibit H, # (9) Exhibit I, # (10) Exhibit J)(Earle, Peter)

**2:11-cv-00562-JPS-DPW-RMD Notice has been electronically mailed to:**

Aaron H Kastens ahkastens@michaelbest.com, mlcrimmins@michaelbest.com

Adam B Stephens astephens@milwaukee.gov

Brady C Williamson bwilliam@gklaw.com, agrote@gklaw.com, jschwartz@gklaw.com

Colleen E Fielkow cfielkow@reinhardtlaw.com, kkempski@reinhardtlaw.com

Daniel Kelly DKelly@reinhardtlaw.com, aschneik@reinhardtlaw.com

Daniel S Lenz dlenz@lawtoncates.com



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**Original filename:**

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**Original filename:**

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**Original filename:**

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**Original filename:**

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